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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 FACEBOOK, INC. and MARK ZUCKERBERG,

15 Plaintiffs,

16 v.

17 CONNECTU LLC, (now known as CONNECTU
18 INC.) CAMERON WINKLEVOSS, TYLER
19 WINKLEVOSS, DIVYA NARENDRA,
20 PACIFIC NORTHWEST SOFTWARE, INC.,
21 WINSTON WILLIAMS, WAYNE CHANG, and
22 DAVID GUCWA, AND DOES 1-125,

23 Defendants.

CASE NO. C 07-01389 RS

**SUPPLEMENTAL DECLARATION OF
WINSTON WILLIAMS IN SUPPORT
OF DEFENDANTS PACIFIC
NORTHWEST SOFTWARE, INC.'S
AND WINSTON WILLIAMS'S REPLY
TO PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION**

Date: July 11, 2007
Time: 9:30 a.m.
Dept. 4
Judge: Hon. Richard Seeborg

1 I, WINSTON WILLIAMS, declare

2 1. I previously submitted a declaration in this case which was signed and
3 filed on or about March 21, 2007;

4 2. As I stated in my deposition on June 19, 2007, prior to being named as a
5 defendant in this lawsuit, I did not know the location of Facebook, Inc., or any entity
6 owning or having an interest in the websites www.thefacebook.com or
7 www.facebook.com;

8 3. I have never met Mark Zuckerberg, and do not know and have never
9 known where he resides;

10 4. I have very limited means to support myself. I am not employed.
11 Currently I sporadically assist others by writing computer programs. When I am retained
12 for such jobs, it is usually for a limited time. In the recent past, nearly all of my clients
13 have come from the greater Seattle, Washington area. My ability to attract work for
14 myself is directly related to others in the Seattle area introducing me to potential clients,
15 and my personally meeting with said clients. If I were forced to leave Seattle for longer
16 than a few days, my ability to earn a living would be substantially impaired;

17 5. I do not have the funds to travel. I am not in a position to pay for an
18 airplane ticket to go anywhere, including San Jose, California. I do not have the funds to
19 pay for accommodations away from my apartment in Seattle, Washington. In light of my
20 very limited financial means, I would be unable to attend trial in San Jose, California, if
21 this case continues there.

22 I declare under penalty of perjury under the laws of the United States that the
23 foregoing is true and correct and that this declaration was executed on the 2nd day of
24 July, 2007 at Seattle, Washington.

25
26 
27 Winston Williams